

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

3 JEFF HULBERT, et al, :

4 Plaintiffs, : Civil Case No.

5 vs. : 1:18-cv-02317 GLR

6 SGT. BRIAN T. POPE, et al, :

7 Defendants. :

8 - - - - -

9 DEPOSITION of CAPTAIN REBECCA LABS

10 Baltimore, Maryland

11 Tuesday, October 22, 2019

12 10:06 A.M.

13  
14  
15  
16 Job No: 41756

17 Pages 1 - 196

18 Reported by: Barbara A. Conner

19  
20 EXHIBIT Y

1 Deposition of CAPTAIN REBECCA LABS, held at  
2 the offices of:

3  
4 HANSEL LAW, P.C.  
5 2514 North Charles Street  
6 Baltimore, Maryland 21218  
7 (301) 461-1040

8  
9 Pursuant to Notice, before Barbara A. Conner,  
10 Notary Public of the State of Maryland.

1 A P P E A R A N C E S

2

3 ON BEHALF OF THE PLAINTIFFS:

4 CARY HANSEL, ESQUIRE

5 HANSEL LAW, P.C.

6 2514 North Charles Street

7 Baltimore, Maryland 21218

8 (301) 461-1040

9

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11 ON BEHALF OF THE DEFENDANTS:

12 JOHN C. FREDRICKSON, ESQUIRE

13 ROBERT A. MCFARLAND, ESQUIRE

14 OFFICES OF THE ATTORNEY GENERAL

15 DEPARTMENT OF GENERAL SERVICES

16 300 West Preston Street

17 Room 608

18 Baltimore, Maryland 21201

19 (410) 767-1825

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P R O C E E D I N G S

CAPTAIN REBECCA LABS,

having been duly sworn, testified as follows:

EXAMINATION BY COUNSEL FOR PLAINTIFFS

BY MR. HANSEL:

Q Thank you for your time here today. We met off the record, but my name is Cary Hansel. I'm going to be taking your deposition today and I'm going to go over some ground rules before we get started. I know you're well represented by capable lawyers here and that, as a result, some of these are kind going to be familiar to you, these ground rules.

**A Okay.**

Q But please bear with me, it will keep me in practice and will also make sure you and are on the same page. Okay?

Most of the ground rules center around the fact that this woman to my right here, your left, is doing her level best to take down everything that both of us says, and it has to do with the fact that you're under oath, so we have a sort of a shared interest in

1           **A       Okay.**

2           Q       Does that sound good?

3           **A       Yes.**

4                   (Playing recording.)

5           Q       So, you heard the call just then, I played it  
6 for you, is that right?

7           **A       Yes.**

8           Q       That was the same call you heard back in  
9 February of 2018?

10          **A       Sounds like it.**

11          Q       Now, what I heard, and, here, listen again,  
12 what I heard was that he said "there's a couple people."  
13 So, again, the court reporter knows she doesn't have to  
14 type whenever I'm playing this, but listen in the  
15 beginning and see if you agree.

16                   (Playing recording.)

17          Q       Now, did you hear him on the tape, he says,  
18 "Now there's some," and then he corrects himself and  
19 says, "A couple people out at College Avenue and Lawyers  
20 Mall"?

21          **A       I believe that's what I heard, yes.**

1 received again at 4:30, or thereabouts, on February 6,  
2 is that right?

3 **A Yes.**

4 MR. HANSEL: All right, good. Let me take  
5 one three minute break and then we'll be back and I  
6 think that's it.

7 **A Okay.**

8 (Recess.)

9 MR. HANSEL: I have no further questions.

10 MR. FREDRICKSON: We'll read and sign.

11 (Signature not waived.)

12 (Deposition concluded at 1:41 P.M.)

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ACKNOWLEDGMENT OF DEPONENT

I, CAPTAIN REBECCA LABS, do hereby  
acknowledge that I have read and examined the foregoing  
testimony and the same is a true, correct and complete  
transcription of the testimony given by me and any  
corrections appear on the attached errata sheet signed  
by me.

\_\_\_\_\_  
(DATE)

\_\_\_\_\_  
(SIGNATURE)

CERTIFICATE OF NOTARY PUBLIC

I, Barbara A. Conner, Registered Professional Reporter, the officer before whom the foregoing proceedings were taken, do hereby certify that the foregoing transcript is a true and correct record of the proceedings; that said proceedings were taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 6th day of November 2019.

My commission expires:

January 11, 2020

A handwritten signature in cursive script, reading "Barbara A. Conner", is written over a horizontal line.

NOTARY PUBLIC